

Ramos, J

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
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DATE FILED: 8/22/2016

BOSTON RETIREMENT SYSTEM, on behalf
of itself and all others similarly situated,

Plaintiff,

- against -

BANK OF AMERICA, N.A., BANK OF
AMERICA MERRILL LYNCH
INTERNATIONAL LIMITED, CREDIT
AGRICOLE CORPORATE AND
INVESTMENT BANK, CREDIT SUISSE
AG, DEUTSCHE BANK AG, NOMURA
INTERNATIONAL PLC, HIREN GUDKA,
AMANDEEP SINGH MANKU, SHAILEN
PAU, and BHARDEEP SINGH HEER,

Defendants.

Case No. 16-cv-03711 (ER)

CITY OF ATLANTA FIREFIGHTERS
PENSION FUND, on behalf of itself and all
others similarly situated,

Plaintiff,

- against -

BANK OF AMERICA, N.A., BANK OF
AMERICA MERRILL LYNCH
INTERNATIONAL LIMITED, CREDIT
AGRICOLE CORPORATE AND
INVESTMENT BANK, CREDIT SUISSE
AG, DEUTSCHE BANK AG, NOMURA
INTERNATIONAL PLC, HIREN GUDKA,
AMANDEEP SINGH MANKU, SHAILEN
PAU, and BHARDEEP SINGH HEER,

Defendants.

Case No. 16-cv-04151 (ER)

LOUISIANA SHERIFFS' PENSION &
RELIEF FUND, on Behalf of Itself and all
Others Similarly Situated,

Plaintiff,

-against-

BANK OF AMERICA, N.A., MERRILL
LYNCH, PIERCE, FENNER & SMITH,
INCORPORATED, BANK OF AMERICA
MERRILL LYNCH INTERNATIONAL
LIMITED, CREDIT AGRICOLE
CORPORATE AND INVESTMENT BANK,
CREDIT SUISSE AG, DEUTSCHE BANK
AG, NOMURA INTERNATIONAL PLC,
HIREN GUDKA, AMANDEEP SINGH
MANKU, SHAILEN PAU, and BHARDEEP
SINGH HEER,

Defendants.

Case No. 16-cv-04485 (ER)

SHEET METAL WORKERS PENSION
PLAN OF NORTHERN CALIFORNIA, and
IRON WORKERS PENSION PLAN OF
WESTERN PENNSYLVANIA, on behalf of
themselves and all others similarly situated,

Plaintiffs,

- against -

BANK OF AMERICA CORPORATION;
BANK OF AMERICA, N.A.; MERRILL
LYNCH, PIERCE, FENNER & SMITH INC.;
CRÉDIT AGRICOLE S.A.; CRÉDIT
AGRICOLE CORPORATE AND
INVESTMENT BANK; CREDIT SUISSE
AG; CREDIT SUISSE GROUP AG; CREDIT
SUISSE INTERNATIONAL; CREDIT
SUISSE SECURITIES (USA) LLC;
DEUTSCHE BANK AG; DEUTSCHE BANK
SECURITIES INC.; NOMURA HOLDINGS,
INC.; NOMURA INTERNATIONAL PLC,

Case No. 16-cv-04603 (ER)

NOMURA SECURITIES INTERNATIONAL,
INC., HIREN GUDKA; AMANDEEP SINGH
MANKU; SHAILEN PAU; and BHARDEEP
SINGH HEER,

Defendants.

INTER-LOCAL PENSION FUND GRAPHIC
COMMUNICATIONS CONFERENCE OF
THE INTERNATIONAL BROTHERHOOD
OF TEAMSTERS, on Behalf Of Itself and all
Others Similarly Situated.

Plaintiff,

-against-

BANK OF AMERICA CORPORATION;
BANK OF AMERICA, N.A.; MERRILL
LYNCH, PIERCE, FENNER & SMITH,
INC.; BANK OF AMERICA
MERRILL LYNCH INTERNATIONAL
LIMITED; CREDIT AGRICOLE S.A.;
CREDIT AGRICOLE CORPORATE AND
INVESTMENT BANK; CREDIT SUISSE
GROUP AG; CREDIT SUISSE AG; CREDIT
SUISSE INTERNATIONAL; CREDIT
SUISSE SECURITIES (USA) LLC;
DEUTSCHE BANK AG; DEUTSCHE BANK
SECURITIES INC.; NOMURA
INTERNATIONAL PLC; NOMURA
HOLDINGS, INC.; NOMURA SECURITIES
INTERNATIONAL, INC.; HIREN GUDKA;
BHARDEEP SINGH HEER; AMANDEEP
SINGH MANKU; and SHAILEN PAU,

Defendants.

Case No. 16-cv-05011 (ER)

CITY OF BRISTOL PENSION FUND, on
behalf of itself, and, in a representative
capacity, on behalf of all those similarly
situated,

Plaintiff,

Case No. 16-cv-05203 (ER)

-against-

BANK OF AMERICA CORPORATION;
BANK OF AMERICA, N.A.; MERRILL
LYNCH, PIERCE, FENNER & SMITH, INC.;
CREDIT AGRICOLE S.A.; CREDIT
AGRICOLE CORPORATE AND
INVESTMENT BANK; CREDIT AGRICOLE
SECURITIES (USA) INC.; CREDIT SUISSE
SECURITIES (USA) LLC; CREDIT SUISSE
GROUP AG; CREDIT SUISSE
INTERNATIONAL; DEUTSCHE BANK
SECURITIES INC.; DEUTSCHE BANK AG;
NOMURA HOLDINGS, INC.; NOMURA
INTERNATIONAL PLC; NOMURA
SECURITIES INTERNATIONAL, INC.;
HIREN GUDKA; AMANDEEP SINGH
MANKU; SHAILEN PAU; BHARDEEP
SINGH HEER; JOHN DOE DEFENDANTS
NOS. 1-100,

Defendants.

ASBESTOS WORKERS PHILADELPHIA
WELFARE AND PENSION FUND, on behalf
of itself and all others similarly situated,

Plaintiffs,

-against-

BANK OF AMERICA, N.A; MERRILL
LYNCH, PIERCE, FENNER & SMITH INC.;
BANK OF AMERICA MERRILL LYNCH
INTERNATIONAL LTD.; CRÉDIT
AGRICOLE CORPORATE AND
INVESTMENT BANK; CREDIT SUISSE
AG; CREDIT SUISSE GROUP AG; CREDIT
SUISSE INTERNATIONAL; CREDIT
SUISSE SECURITIES (USA) LLC;
DEUTSCHE BANK AG; DEUTSCHE BANK
SECURITIES INC.; NOMURA
INTERNATIONAL PLC, NOMURA
SECURITIES INTERNATIONAL, INC.,
HIREN GUDKA; AMANDEEP SINGH

Case No. 16-cv-05269 (ER)

MANKU; SHAILEN PAU; and BHARDEEP
SINGH HEER,

Defendants.

PAINTERS AND ALLIED TRADES
DISTRICT COUNCIL NO. 35 PENSION
FUND, on Behalf of Itself and all Others
Similarly Situated,

Plaintiff,

-against-

BANK OF AMERICA, N.A., BANK OF
AMERICA MERRILL LYNCH
INTERNATIONAL LIMITED, CREDIT
AGRICOLE CORPORATE AND
INVESTMENT BANK, CREDIT SUISSE AG,
DEUTSCHE BANK AG, NOMURA
INTERNATIONAL PLC, HIREN GUDKA,
AMANDEEP SINGH MANKU, SHAILEN
PAU, and BHARDEEP SINGH HEER,

Defendants.

Case No. 16-cv-05755 (ER)

OKLAHOMA POLICE PENSION AND
RETIREMENT SYSTEM, on behalf of itself,
and, in a representative capacity, on behalf of
all those similarly situated,

Plaintiff,

-against-

BANK OF AMERICA CORPORATION;
BANK OF AMERICA, N.A.; MERRILL
LYNCH, PIERCE, FENNER & SMITH, INC.;
CRÉDIT AGRICOLE S.A.; CRÉDIT
AGRICOLE CORPORATE AND
INVESTMENT BANK; CRÉDIT AGRICOLE
SECURITIES (USA) INC.; CREDIT SUISSE
SECURITIES (USA) LLC; CREDIT SUISSE
GROUP AG; CREDIT SUISSE AG; CREDIT
SUISSE INTERNATIONAL; DEUTSCHE
BANK SECURITIES, INC.; DEUTSCHE
BANK AG; NOMURA HOLDINGS, INC.;

Case No. 16-cv-06133 (ER)

NOMURA INTERNATIONAL PLC;
NOMURA SECURITIES INTERNATIONAL,
INC.; HIREN GUDKA; AMANDEEP SINGH
MANKU; SHAILEN PAU; BHARDEEP
SINGH HEER; and JOHN DOE
DEFENDANTS NOS. 1-100,

Defendants.

**STIPULATION REGARDING SERVICE, PROPOSED CONSOLIDATION, TIME TO
ANSWER, MOVE, OR OTHERWISE RESPOND, AND OTHER PRELIMINARY
MATTERS**

WHEREAS, on May 18, 2016, Boston Retirement System filed a complaint captioned *Boston Retirement System v. Bank of America, N.A., et al.*, Case No. 16-cv-03711 (ER) (S.D.N.Y.) (the “Boston Retirement Action”), against certain defendants, alleging a conspiracy to manipulate the prices of sub-sovereign, supranational, and agency (“SSA”) bonds.

WHEREAS, on June 2, 2016, City of Atlanta Firefighters Pension Fund filed a complaint captioned *City of Atlanta Firefighters Pension Fund v. Bank of America, N.A., et al.*, Case No. 16-cv-04151 (ER) (S.D.N.Y.) (the “City of Atlanta Firefighters Action”), also alleging a conspiracy by certain defendants to manipulate the prices of SSA bonds.

WHEREAS, on June 14, 2016, Louisiana Sheriffs’ Pension & Relief Fund filed a complaint captioned *Louisiana Sheriffs’ Pension & Relief Fund v. Bank of America, N.A., et al.*, Case No. 16-cv-04485 (ER) (S.D.N.Y.) (the “Louisiana Sheriffs’ Action”), also alleging a conspiracy by certain defendants to manipulate the prices of SSA bonds.

WHEREAS, on June 17, 2016, Sheet Metal Workers Pension Plan of Northern California and Iron Workers Pension Plan of Western Pennsylvania filed a complaint captioned *Sheet Metal Workers Pension Plan of Northern California v. Bank of America Corporation, et al.*, Case No. 16-cv-04603 (ER) (S.D.N.Y.) (the “Sheet Metal Workers Action”), also alleging a conspiracy by certain defendants to manipulate the prices of SSA bonds.

WHEREAS, on June 27, 2016, Inter-Local Pension Fund Graphic Communications Conference of the International Brotherhood of Teamsters filed a complaint captioned *Inter-Local Pension Fund Graphic Communications Conference of the International Brotherhood of Teamsters v. Bank of America Corporation, et al.*, Case No. 16-cv-05011 (ER) (S.D.N.Y.) (the “Inter-Local Action”), also alleging a conspiracy by certain defendants to manipulate the prices of SSA bonds.

WHEREAS, on June 30, 2016, City of Bristol Pension Fund filed a complaint captioned *City of Bristol Pension Fund v. Bank of America Corporation, et al.*, Case No. 16-cv-05203 (ER) (S.D.N.Y.) (the “City of Bristol Action”), also alleging a conspiracy by certain defendants to manipulate the prices of SSA bonds.

WHEREAS, on July 1, 2016, Asbestos Workers Philadelphia Welfare and Pension Fund filed a complaint captioned *Asbestos Workers Philadelphia Welfare and Pension Fund v. Bank of America, N.A., et al.*, Case No. 16-cv-05269 (ER) (S.D.N.Y.) (the “Asbestos Workers Action”), also alleging a conspiracy by certain defendants to manipulate the prices of SSA bonds.

WHEREAS, on July 19, 2016, Painters and Allied Trades District Council No. 35 Pension Fund filed a complaint captioned *Painters And Allied Trades District Council No. 35 Pension Fund v. Bank of America, N.A., et al.*, Case No. 16-cv-5755 (ER) (S.D.N.Y.) (the “Painters Action”), also alleging a conspiracy by certain defendants to manipulate the prices of SSA bonds.

WHEREAS, on August 2, 2016, Oklahoma Police Pension and Retirement System filed a complaint captioned *Oklahoma Police Pension and Retirement System v. Bank of America Corporation, et al.*, Case No. 16-cv-06133 (ER) (S.D.N.Y.) (the “Oklahoma Police Action”), also alleging a conspiracy by certain defendants to manipulate the prices of SSA bonds.

WHEREAS, the Boston Retirement Action, City of Atlanta Firefighters Action, Louisiana Sheriffs' Action, Sheet Metal Workers Action, Inter-Local Action, City of Bristol Action, Asbestos Workers Action, Painters Action, and Oklahoma Police Action are collectively referred to as the "Pending SSA Litigation." The following parties ("Defendants") are defendants in one or more of the cases comprising the Pending SSA Litigation:

Bank of America Corporation;

Bank of America, N.A.;

Bank of America Merrill Lynch International Limited;

Crédit Agricole S.A.;

Crédit Agricole Corporate and Investment Bank;

Crédit Agricole Securities (USA) Inc.;

Credit Suisse AG;

Credit Suisse Group AG;

Credit Suisse International;

Credit Suisse Securities (USA) LLC;

Deutsche Bank AG;

Deutsche Bank Securities Inc.;

Merrill Lynch, Pierce, Fenner & Smith Incorporated;

Nomura Holdings, Inc.

Nomura International plc.; and

Nomura Securities International, Inc.,

WHEREAS, on June 13 and 14, and July 19, 2016, the Court "So Ordered" the parties' joint letter motions in the Boston Retirement Action, City of Atlanta Firefighter Action, and

Sheet Metal Workers Action, respectively, which stays the time for all defendants in those cases to answer, move, or otherwise respond to the complaints pending further negotiation of certain matters. There has been no prior request to extend any deadlines in any of the cases comprising the Pending SSA Litigation.

ACCORDINGLY, IT IS HEREBY STIPULATED THAT:

1. The undersigned counsel for each Defendant agrees to waive service of process in each of the individual cases comprising the Pending SSA Litigation on behalf of its respective client(s), expressly reserving the right to contest whether any party in the Pending SSA Litigation is properly named, and without waiver of any defenses, including those related to personal jurisdiction and venue.

2. The deadlines for all defendants named in the complaints to answer, move or otherwise respond to the complaints in each of the cases comprising the Pending SSA Litigation are stayed as provided in this Stipulation, to the extent that such deadlines presently exist or may come to exist following the execution of this Stipulation but before the cases comprising the Pending SSA Litigation are formally consolidated and a response and briefing schedule is set for any consolidated complaint. The stay shall be without prejudice to any party's right to seek relief from the stay.

3. Subject to the Court's approval, the nine individual actions comprising the Pending SSA litigation are consolidated under the docket number 16-cv-03711 and captioned as "In re SSA Bonds Antitrust Litigation." Any additional complaint filed in this district containing substantially similar allegations as those in the Pending SSA Litigation that is marked as related to the Pending SSA Litigation and accepted by the Court as such (a "Subsequent Action") shall also be consolidated with the cases comprising the Pending SSA Litigation. Plaintiffs in the

Pending SSA Litigation shall serve written notice of such consolidation on the plaintiff(s) in the Subsequent Action and on any defendant in such Action who is not a party in the Pending SSA Litigation, and any party in the Subsequent Action shall have 10 days from the date that notice is served to file a motion with the Court objecting to such consolidation and setting forth the basis for objection.

4. The following schedule shall apply to the Pending SSA Litigation and any case that is consolidated with the Pending SSA Litigation:

a. **Appointment of Interim Lead Counsel:** Within 60 days after the entry of this Order, Plaintiffs' counsel in the Pending SSA Litigation, or any case that is consolidated with the Pending SSA Litigation, shall file a motion for appointment of interim lead counsel.


b. **Initial Status Conference:** Within 21 days after entry of the Court's Order appointing interim lead counsel, interim lead counsel for Plaintiffs and counsel for Defendants shall meet and confer and submit a joint letter that (i) sets a proposed deadline for lead counsel to file a consolidated amended complaint, (ii) establishes a proposed briefing schedule for the defendants' motion(s) to dismiss, (iii) requests that the Court schedule a status conference, and (iv) provides the Court with a proposed agenda for the conference. If the parties are unable to agree on whether or not to include a particular item on the agenda, the letter shall note the fact of disagreement without argument of either side's position.

5. If a complaint containing substantially similar allegations as those in the Pending SSA Litigation is filed in another federal judicial district (a "Non-Consolidated Action"), the parties in the Pending SSA Litigation will meet and confer within five business days of such filing regarding possible adjustments to the proceedings contemplated by this Stipulation. If

agreement cannot be reached, any party in the Pending SSA Litigation may apply to this Court for such relief as it deems appropriate.

DATED: August 19, 2016

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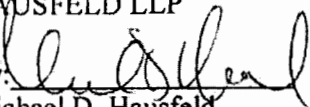
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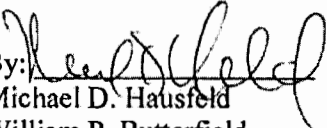
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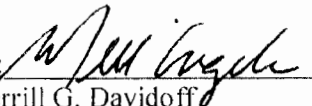
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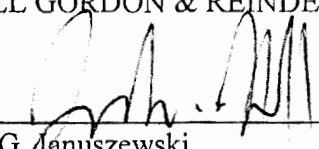
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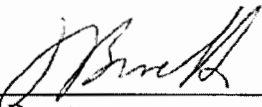
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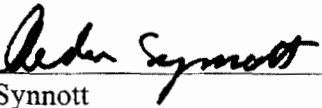
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IT IS SO ORDERED.

DATED: 8/22/2016

A handwritten signature in blue ink, appearing to read 'Edgardo', is positioned above a horizontal line.

HON. EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE

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